

1 Steven L. Woodrow*
swoodrow@woodrowpeluso.com
2 Patrick H. Peluso*
ppeluso@woodrowpeluso.com
3 Taylor T. Smith*
tsmith@woodrowpeluso.com
4 **WOODROW & PELUSO, LLC**
3900 East Mexico Avenue, Suite 300
5 Denver, Colorado 80210
Telephone: (720) 213-0675
6 Facsimile: (303) 927-0809

7 **Pro Hac Vice*

8 Attorneys for Plaintiff and the alleged Classes

9 Julie R. Trotter
jtrotter@calljensen.com
10 Delavan J. Dickson
ddickson@calljensen.com
11 Kent R. Christensen
kchristensen@calljensen.com
12 **CALL & JENSEN**
610 Newport Center Drive, Suite 700
13 Newport Beach, California 92660
Telephone: 949-717-3000
14 Facsimile: 949-717-3100

15 Attorneys for Defendant

16 [Additional counsel appearing on signature page]

17 **UNITED STATES DISTRICT COURT**

18 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

19
20 **Edwardo Munoz**, individually and on
behalf of all others similarly situated,

21 Plaintiff,

22 v.

23 **7-Eleven, Inc.**, a Texas corporation,

24 Defendant.

Case No. 2:18-cv-03893-RGK-AGR

**JOINT REPORT REGARDING
DISCOVERY DISPUTES**

Judge: Hon. R. Gary Klausner
Magistrate Judge: Hon. A. Rosenberg

Complaint Filed: May 9, 2018
Trial Date: July 2, 2019
Discovery Conf: February 28, 2019

1 The Parties, Edwardo Munoz, on behalf of himself and the Class, and 7-
2 Eleven, Inc., hereby submit the following Joint Report in advance of the telephonic
3 discovery conference set for February 28, 2019 at 10:00 a.m.:

4 The Parties have met and conferred extensively regarding 7-Eleven's
5 responses to discovery propounded by Plaintiff and have narrowed their remaining
6 issues to three disputes:

7 1. Plaintiff's Interrogatory No. 2 & Requests to Produce 5 & 11 regarding
8 the production of class member identifying information to Plaintiff's Counsel and the
9 claims administrator (KCC) as opposed to limiting the production of such
10 information to KCC only;

11 2. Plaintiff's Request to Produce No. 10 and Deposition Topic 6 regarding
12 7-Eleven's legal department size and budget; and

13 3. Deposition questions regarding any advice 7-Eleven received from its
14 internal or external counsel regarding the use or editing of its form FCRA
15 background check disclosure.

16
17 Dated: February 26, 2019

Edwardo Munoz, individually and on behalf
of all others similarly situated,

18
19 By: /s/ Steven L. Woodrow
One of Plaintiff's Attorneys

20
21 Mike Arias (CSB #115385)
mike@asstlawyers.com
22 Alfredo Torrijos (CSB #222458)
alfredo@asstlawyers.com
23 **ARIAS SANGUINETTI WANG &**
24 **TORRIJOS, LLP**
25 6701 Center Drive West, 14th Floor
26 Los Angeles, California 90045
27 Telephone: (310) 844-9696
28 Facsimile: (310) 861-0168

1 Steven L. Woodrow
2 swoodrow@woodrowpeluso.com
3 Patrick H. Peluso
4 ppeluso@woodrowpeluso.com
5 Taylor T. Smith
6 tsmith@woodrowpeluso.com
7 **WOODROW & PELUSO, LLC**
8 3900 East Mexico Avenue, Suite 300
9 Denver, Colorado 80210
10 Telephone: (720) 213-0675
11 Facsimile: (303) 927-0809

Attorneys for Plaintiff Edwardo Munoz

12 Dated: February 26, 2019

7-Eleven, Inc.,

13 By: /s/ Julie R. Trotter
14 One of Defendant's Attorneys

15 Julie R. Trotter
16 jtrotter@calljensen.com
17 Delavan J. Dickson
18 ddickson@calljensen.com
19 Kent R. Christensen
20 kchristensen@calljensen.com
21 **CALL & JENSEN**
22 610 Newport Center Drive, Suite 700
23 Newport Beach, California 92660
24 Telephone: 949-717-3000
25 Facsimile: 949-717-3100

Attorneys for Defendant 7-Eleven, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above titled document was served upon counsel of record by filing such papers via the Court's ECF system on February 26, 2019.

/s/ Steven L. Woodrow